

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION

MDL No. 2817
Case No. 18-cv-00864

This Document Relates To:

Hon. Rebecca R. Pallmeyer

*Loop, LLC, d/b/a AutoLoop v. CDK Global,
LLC*, Case No. 18-cv-2521

PLAINTIFF AUTOLOOP'S MOTION FOR CLASS CERTIFICATION

Pursuant to Federal Rule of Civil Procedure 23, Plaintiff Loop, LLC, d/b/a AutoLoop ("AutoLoop") hereby respectfully requests that the Court grant class certification of the following Vendor Class under Rule 23(b)(3):

All automotive software vendors (i.e., persons or entities engaged in the sale of software solutions to automotive dealerships) located in the United States that, at any time since October 1, 2013, have purchased data integration services from CDK or Reynolds.

Autoloop also respectfully requests that the Court appoint AutoLoop as class representative for the Vendor Class, and appoint Kellogg Hansen and Prof. Samuel Issacharoff as class counsel under Rule 23(g) for the Vendor Class. In support of this motion, AutoLoop incorporates by reference the concurrently filed memorandum of law, an expert report, any reply memorandum that AutoLoop may file, and any oral argument that the Court allows.

Dated: November 21, 2023

Respectfully submitted,

/s/ Derek T. Ho

Derek T. Ho

Michael N. Nemelka

Aaron M. Panner

Daniel V. Dorris

Collin R. White

Bethan R. Jones

Ana N. Paul

KELLOGG, HANSEN, TODD,

FIGEL & FREDERICK, P.L.L.C.

1615 M Street, N.W., Suite 400

(202) 326-7900

Washington, D.C. 20036

dho@kellogghansen.com

mnemelka@kellogghansen.com

apanner@kellogghansen.com

ddorris@kellogghansen.com

cwhite@kellogghansen.com

bjones@kellogghansen.com

apaul@kellogghansen.com

*MDL Co-Lead Counsel and Interim Class Counsel
representing Loop, LLC, d/b/a AutoLoop on behalf
of itself and all others similarly situated*

Samuel Issacharoff

40 Washington Square South

New York, NY 10012

(212) 998-6580

si13@nyu.edu

MDL Coordinating Counsel

CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on November 21, 2023, I caused a true and correct copy of the foregoing **PLAINTIFF AUTOLOOP'S MOTION FOR CLASS CERTIFICATION** to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ Derek T. Ho

Derek T. Ho

**KELLOGG, HANSEN, TODD,
FIGEL & FREDERICK, P.L.L.C.**

1615 M Street, N.W., Suite 400

Washington, D.C. 20036

(202) 326-7900

dho@kellogghansen.com